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April 18, 2022

**VIA ECF**

Magistrate Judge Steven I. Locke  
United States District Court  
100 Federal Plaza, Courtroom 820  
Central Islip, NY 11722

**Re: *Sea Tow Services International, Inc. v. Tampa Bay Marine Recovery Inc. et al.*,  
Case No. 2:20-cv-02877-JS-SIL – Letter Motion for Acceptance of the Jaeger’s  
Opposition to Sea Tow’s Motion to Compel**

Dear Judge Locke:

We represent the Jaeger Defendants (the “Jaegers”). We write in conjunction with our contemporaneous filing of our opposition papers (ECF 204) to Plaintiff Sea Tow Services International, Inc.’s (“Sea Tow’s”) Letter Motion to Compel on the Docket (ECF No. Dkt. 200, 200-1 – 200-5). It appears that Plaintiff Sea Tow incorrectly filed its Motion to Compel early, and without including the Jaegers’ Opposition Papers. This was in error (it did not comply with the “bundle rule”), and we write to request that our filing in opposition (at ECF 204) be accepted to correct the issue, and so that the Court has our opposition papers.

Pursuant to this Court’s Civil Conference Minute Order, dated February 2, 2022 (Dkt. 192), this Court ordered the parties to exchange service copies of their respective motion to compel papers, and then to file the fully-briefed motion papers pursuant to the “Bundle Rule” on Monday, April 18, 2022. We timely served our opposition papers on Sea Tow on April 1, 2022. For reasons unbeknownst to the Jaegers, Sea Tow prematurely filed its letter motion to compel the Jaegers on Friday, April 15, 2022, and failed to include the Jaegers’ Letter Opposition to Sea Tow’s Motion to Compel in its bundle filing. (*See* Dkt. 200, 200-1 – 200-5). We trust this was an inadvertent error, and all we want to do is correct it.

Accordingly, to cure this issue, we respectfully request the Court accept the Jaegers’ Letter Opposition together with Sea Tow’s Motion to Compel (as if they had been properly included under the Bundle Rule and this Court’s 2/2/22 Order (Dkt. 192)), or grant such further relief as may be just and appropriate under the circumstances.

Respectfully Submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
John A. Karol [JK-9899]

cc: Counsel of record (via ECF)